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Chicago Mercantile Exchange

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August 6, 2004

Ms. Jean A. Webb
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Re: Certification for Clarification of Rules 20403.C, 20503.C and 20603.C. pursuant to CFTC Regulation §40.6. CME Submission #04-81.

Dear Ms. Webb,

Chicago Mercantile Exchange Inc. (CME) notifies the Commission that the Board of Directors approved the following rule clarification concerning deliveries on futures contracts for Urea, Diammonium Phosphate and Urea Ammonium Nitrate:

The switching charges referred to in Rules 20403.C, 20503.C and 20603.C are only those incurred due to a shipment originating from, destined for or moving through the central freight basing point specified in the Rules.

CME certifies that this action neither violates nor is inconsistent with any provision of the Commodity Exchange Act or of the rules thereunder.

Please do not hesitate to contact Jack Cook at 312-930-3295 or jcook@cme.com if any questions arise during the processing of this submission. Please reference our CME Submission #04-81 on all future correspondence for this submission.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Labuszewski", with a stylized flourish at the end.

John W. Labuszewski, Director
Research & Product Development